ICC Docket No. 02-0864 **Illinois Commerce Commission** STAFF Data Request No. RK 1.14c

Request:

Please define the fiber-copper crossover point as used in Mr. Smallwood's testimony, SBC-IL Ex. 4.0, at lines 372-374, and in Mr. White's testimony, SBC-IL Ex. 8.0, at lines 609-610. In addition, please answer the following concerning the fiber-copper crossover point:

Please state whether SBC has plans to limit the length of copper in its Illinois network to under 12kft per loop in the next five years for new or existing plant;

Response:

SBC Illinois deployment plans for the Illinois network are done on cost analysis basis, deploying the lowest cost solution to meet the service needs of customers. With those being the primary drivers, in general, the lengths of loops in the copper network for new plant will be limited to approximately 12 kft, except in those particular relief plan or new deployment where a financial analysis might yield a different solution.

For existing plant, there are no plans to limit the length of the copper network, except as financially prudent on a case by case basis when relief is required.

Witness Responsible:

Randall S. White

5BC (nos) 59 3/19/04 th